

**UNITED STATES DISTRICT COURT  
FOR THE SOUTHERN DISTRICT OF NEW YORK**

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IN RE: TERRORIST ATTACKS ON  
SEPTEMBER 11, 2001

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) **Civil Action No. 03 MDL 1570 (GBD) (SN)**  
) **ECF Case**  
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This document relates to:

*Federal Insurance Co., et al. v. al Qaida, et al.*, No. 03-cv-6978  
*Vigilant Insurance Co., et al. v. Kingdom of Saudi Arabia, et al.*, No. 03-cv-8591  
*Thomas Burnett, Sr., et al. v. Al Baraka Inv. & Dev. Corp., et al.*, No. 03-cv-9849  
*Estate of John P. O'Neill, Sr., et al. v. Kingdom of Saudi Arabia, et al.*, No. 04-cv-1922  
*Continental Casualty Co., et al. v. Al Qaeda, et al.*, No. 04-cv-5970  
*Cantor Fitzgerald Assocs., et al. v. Akida Inv. Co., et al.*, No. 04-cv-7065  
*Pacific Employers Insurance Co., et al. v. Kingdom of Saudi Arabia, et al.*, No. 04-cv-7216  
*Euro Brokers Inc., et al. v. Al Baraka Inv. & Dev. Corp., et al.*, No. 04-cv-7279  
*Beazley Furlonge Ltd. v. Saudi Binladin Group, Inc., et al.*, No. 16-cv-7456  
*Bowrosen, et al. v. Kingdom of Saudi Arabia*, No. 16-cv-8070  
*McCarthy, et al. v. Kingdom of Saudi Arabia*, No. 16-cv-8884  
*Aguilar, et al. v. Kingdom of Saudi Arabia, et al.*, No. 16-cv-9663  
*Addesso, et al. v. Kingdom of Saudi Arabia, et al.*, No. 16-cv-9937  
*Hodges, et al. v. Kingdom of Saudi Arabia, et al.*, No. 17-cv-117  
*DeSimone v. Kingdom of Saudi Arabia*, No. 17-cv-348  
*Aiken, et al. v. Kingdom of Saudi Arabia, et al.*, No. 17-cv-450  
*Ashton, et al. v. Kingdom of Saudi Arabia*, No. 17-cv-2003  
*The Underwriting Members of Lloyd's Syndicate 53, et al. v. Kingdom of Saudi Arabia, et al.*,  
No. 17-cv-2129  
*The Charter Oak Fire Insurance Co., et al. v. Al Rajhi Bank, et al.*, No. 17-cv-2651  
*General Reinsurance Corp., et al. v. Kingdom of Saudi Arabia*, No. 17-cv-3810  
*Abarca, et al. v. Kingdom of Saudi Arabia, et al.*, No. 17-cv-3887  
*Arrowood Indemnity Co. v. Kingdom of Saudi Arabia, et al.*, No. 17-cv-3908  
*Abrams, et al. v. Kingdom of Saudi Arabia, et al.*, No. 17-cv-4201  
*Abtello, et al. v. Kingdom of Saudi Arabia, et al.*, No. 17-cv-5174  
*Aasheim, et al. v. Kingdom of Saudi Arabia, et al.*, No. 17-cv-5471

**NOTICE OF RENEWED MOTION TO DISMISS**

PLEASE TAKE NOTICE that, pursuant to Rules 7(b) and 12(b)(1), (2), and (6) of the Federal Rules of Civil Procedure and Local Civil Rule 7.1, Defendant Kingdom of Saudi Arabia hereby appears for the purpose of moving the Court, before the Honorable George B. Daniels,

United States District Judge, at the United States District Court for the Southern District of New York, 500 Pearl Street, New York, New York, 10007, at a date and time to be determined by the Court, for an order dismissing all of the claims asserted against the Kingdom of Saudi Arabia for want of subject matter and personal jurisdiction, and, in the alternative, for failure to state a claim. A memorandum of law in support of this Motion is filed herewith.

PLEASE TAKE FURTHER NOTICE that, pursuant to a scheduling order issued by the Honorable Sarah Netburn (ECF No. 3514), any opposing papers shall be filed electronically no later than October 2, 2017.

Dated: August 1, 2017

Respectfully submitted,

/s/ Michael K. Kellogg

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### CERTIFICATE OF SERVICE

I hereby certify that, on this 1st day of August 2017, I caused a copy of the foregoing document to be served electronically via the Court's ECF system on the consolidated MDL docket and the individual dockets for the following cases, which I understand to include all but two\* of the consolidated MDL cases in which Saudi Arabia is named as a Defendant:

*Federal Insurance Co., et al. v. al Qaida, et al.*, No. 03-cv-6978  
*Vigilant Insurance Co., et al. v. Kingdom of Saudi Arabia, et al.*, No. 03-cv-8591  
*Thomas Burnett, Sr., et al. v. Al Baraka Inv. & Dev. Corp., et al.*, No. 03-cv-9849  
*Estate of John P. O'Neill, Sr., et al. v. Kingdom of Saudi Arabia, et al.*, No. 04-cv-1922  
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*Abtello, et al. v. Kingdom of Saudi Arabia, et al.*, No. 17-cv-5174  
*Aasheim, et al. v. Kingdom of Saudi Arabia, et al.*, No. 17-cv-5471

/s/ Michael K. Kellogg

Michael K. Kellogg

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\* The remaining two individual cases in which Saudi Arabia is named as a Defendant are *Continental Casualty Co., et al. v. Al Qaeda, et al.*, No. 04-cv-5970 and *The Charter Oak Fire Insurance Co., et al. v. Al Rajhi Bank, et al.*, No. 17-cv-2651. Saudi Arabia is presently unable to file in those dockets and is serving counsel in those cases via the MDL docket and electronic mail. A separate letter will also be sent notifying the Court.